



# **UST Site Inspection Checklist Guidance**

Publication No. 04-09-089

Revised May 2014

For additional copies of this document, contact:

Department of Ecology  
Publications Distribution Center  
PO Box 47600  
Olympia WA 98504-7600  
Telephone: (360) 407-7472

*If you require this publication in an alternate format, please contact the Toxics Cleanup Program at (360) 407 7170, or TTY 711 or 1-800 833-6388.*

## ***TABLE OF CONTENTS***

I. Records Review .....	1
A. General Documents .....	1
B. Corrosion Protection Records .....	2
C. Rectifier for Impressed Current System .....	3
D. Tank Release Detection Records: .....	3
E. Line Release Detection Records.....	5
II. UST Equipment Observations .....	6
F. Manhole Above Tank .....	6
G. Spill/Overfill Equipment.....	7
H. Dispenser/Aboveground Equipment .....	8
EPA Compliance Tracking.....	10
Inspection Checklist Acronym/Abbreviation List.....	11

**State of Washington**  
**Department of Ecology**  
**UST Inspection Checklist Guidance Document**

This guidance document is intended to provide information to help underground storage tank (UST) inspectors complete an Inspection Checklist for Underground Storage Tank Sites while conducting UST site inspections. The inspection checklist must be used for compliance and “full” technical assistance inspections, where EPA Compliance Tracking information, or “SOC”, is included. For information about EPA Compliance Tracking, see page 9.

## **I. Records Review**

Owners and operators are required to submit the following information to the Department of Ecology (Ecology) or delegated agency, where noted. WAC 173-360-210(1)

- Notification and certification of new UST installations within 30 days after completing the installation.
- Proof of financial responsibility (Dept. of Revenue) at time of Business License application or renewal.
- Reports of confirmed or suspected releases, including the results of any investigations or corrective actions taken
- Notification of change in tank status, including permanent or temporary closure, within 30 days after such a change occurs.
- Ecology checklists for each of the following regulated activities performed:
  - Testing tanks or piping for tightness
  - Testing of release detection equipment
  - Testing cathodic protection systems
  - Retrofits or repairs to a UST system
  - Site check or site assessment reports

Service providers are required to provide checklists to owners/operators within 30 days of completing tank service activities.

### **A. General Documents**

1. **FUEL DISTRIBUTOR**: The most often or recently used fuel distribution company and the last delivery date is documented for information and enforcement purposes only.
2. **BL**: A Business License (BL) is issued after the Department of Revenue (DOR) receives payment of annual tank fees and proof of financial responsibility. The BL must include an underground storage tank endorsement for each operational, temporarily-closed, or deferred tank. Temporarily-closed tanks are listed separately and the endorsement status will appear as “hold” in the UST database. A multi-compartment tank is counted as one tank.

If tanks are not listed on the BL or the BL has expired, the UST facility is out of compliance. In these cases, inspectors should coordinate with HQ UST staff to resolve any problems.

New tank owners or operators must submit an “Underground Storage Tank Addendum” to DOR within 30 days after ownership of an UST system has changed. The site address listed on the BL must be the property where the tanks are located. WAC 173-360-130(1) and -190

3. **FR IN COMPLIANCE**: Proof of financial responsibility is required by all owners/operators of petroleum USTs except state and federal agencies. For most owners/operators, this requirement is demonstrated with a pollution liability insurance policy. The policy must have the same wording as WAC 173-360-480 (unless otherwise approved by PLIA) and include the

tank site address, the correct number of tanks, and an expiration date; the policy must not be expired. Coverage must include \$500,000 per occurrence and aggregate amounts. Marketers using over 10,000 gallons per month must have \$1,000,000 coverage amounts.

Owners using self-insurance or other mechanism must have proof that the mechanism follows these requirements.

- -470 Letter from the Chief Financial Officer
- -473 Guarantee
- -483 Performance Bond
- -486 Irrevocable standby letter of credit
- -490 Trust Agreement

It is recommended that copies of these assurances be reviewed by the Pollution Liability Insurance Agency to ensure they include all the required language. **If tanks are not currently covered by an acceptable mechanism, a Notice of Delivery Prohibition may be issued.** WAC 173-360 Part IV

4. **CLASS A, B, AND C OPERATOR COMPLIANT:** Class A and B operators are required to receive training about UST system equipment and requirements. This training will likely be classified as Class A/B training and covers topics required for both Class A and B operators.

Training is to include emergency and spill response for all operators, including Class C. The deadline for operators to be trained was December 31, 2012 unless an operator began the duties of the operator class after this date. In these cases, the following training schedule applies:

- Class A and B operators: within 60 days of assuming duties
- Class C operators: before assuming duties

Class A and B operators must attend a course provided by a company previously approved by Ecology. Class C operators may be trained by a pre-approved vendor or a Class A or B operator. WAC 173-360-700 through 760

**To demonstrate compliance for purposes of EPA Compliance Tracking, operators must be trained and certified prior to the day of inspection. Mark “yes” if Class A/B and/or C operators were trained prior to the date of inspection or, for example, Line 4 was marked “no” for recordkeeping violations but the operators had been trained. If the operators did not receive Class A, B and C training prior to the inspection, mark “no”.**

## **B. Corrosion Protection Records**

5. **LAST CP TEST SURVEYED THE FOLLOWING STEEL COMPONENTS IN CONTACT WITH SOIL AND HAD PASSING RESULTS:** The cathodic protection evaluation indicates which steel portions of the UST system are cathodically protected and were tested. The cathodic protection system must have passing or equivalent results (i.e. the continuity and system surveys have readings as described on evaluation checklist instructions) and be operating properly. **If steel tanks were not upgraded in 1998, the tank system must be permanently closed. If the tank and/or piping is not currently cathodically protected (failed CP test or inoperable CP system) OR the piping was not upgraded by December 22, 1998, a Notice of Delivery Prohibition may be issued.** WAC 173-360-320(1)
6. **CP TEST FREQUENCY IN COMPLIANCE:** Galvanic and impressed current systems must be tested at the time of an install or repair; within one to six months after an install/repair; and every three years thereafter. The testing must include all steel tanks, steel piping, and steel flex connectors in contact with soil. Owners are required to maintain results from the last two tests. WAC 173-360-320(2)(a)

7. **INT. LINING MEETS 10 AND 5 YR. INSPECTION FREQUENCY AND HAS PASSING RESULTS:** Internally lined tanks that have not had cathodic protection must be “internally inspected” 10 years after the lining was installed and every five years thereafter. If a tank has not passed an internal inspection, requirements of WAC 173-360-325 (applicable codes and standards API 1631, NLPAS 631, etc.) must be met to determine if the tank(s) can be repaired and/or re-lined. WAC 173-360-310(2)(a)(ii)

### C. Rectifier for Impressed Current System

8. **INSPECTED EVERY 60 DAYS AND APPEARS TO BE OPERATING CONTINUOUSLY:** The tank operator must inspect the impressed current rectifier at least every 60 days and document the amps and volts readings to ensure they remain within the recommended ranges provided by the CP tester or expert. WAC 173-360-320(3)

Impressed current systems must be operated (i.e. power is on) and maintained continuously. Some rectifiers have Hobbes Meters or clocks, so calculations can determine if the power has been off for a period of time since the rectifier was installed (each year has 8,544 hours). If the rectifier appears to have been off for a long period of time, a corrosion expert must evaluate the system and make recommendations on the status of the CP system within 30 days (upcoming CP gap policy will address these types of situations). **If the rectifier has not been operational (i.e. on and providing power to the CP system) for an extended period of time, a Notice of Delivery Prohibition may be issued.** WAC 173-360-320(1)

9. **AMP/VOLT READINGS WITHIN REC. RANGES:** The inspector collects information from the rectifier to ensure the amps and volts readings on the rectifier fall within the recommended ranges provided by the corrosion tester or expert. If one or both of the readings are outside the range, the tank operator must have a corrosion expert investigate the problem or test/repair the system. WAC 173-360-320(3)

### D. Tank Release Detection Records:

Most tanks can only use Inventory Control (tank sticking) and Tank Tightness Testing for up to 10 years after a system is installed (see below). After this period, most tanks must use a form of “monthly monitoring” for release detection. Release detection records must be kept for five years. WAC 173-360-345

**For EPA Compliance Tracking, mark “yes” in the last section if the owner/operator has 8 of the last 12 months’ (including the last two consecutive months) compliant leak detection results available for review.**

10. **TANK RD METHOD USED:** Check the appropriate box. If it is different than what is in the UST database make updates upon return to the office. Use this information to determine which of the following lines (18-27) apply. **If no release detection method is being used, a Notice of Delivery Prohibition should be issued.**
11. **TANK RD COMPLIANT:** For release detection monitoring, verify records for each tank or tank compartment has compliant results for the previous 12 months. One history report does not substitute for 12 months of records. The tank operator must be conducting the appropriate checks, as required, for the method used. The method must be capable of checking the tank for releases at least every 30 days. WAC 173-360-335(2)(a), -355(1)

12. **RD METHOD IS COMPLIANT WITH 3<sup>RD</sup> PARTY CERT.:** Most release detection methods must be 3<sup>rd</sup> party certified. As guidance, you may compare NWGLDE's review of the 3<sup>rd</sup>-party certification with the specific tanks you are inspecting to ensure the method is compliant. For example, the review includes information about maximum tank capacities, minimum product levels, throughput and compatible fuels. If an automatic tank gauge is 3<sup>rd</sup>-party certified (section j), owners do not need to do daily inventory or operate the ATG in test mode (sub-section e). WAC 173-345(1)
13. **ATG MODEL:** Document the tank monitor model used for the UST system(s) and verify the tank sizes and product stored match the UST database.
14. **ATG IS NOT IN ALARM:** If the release detection equipment is in alarm, the owner must prove it is a "false alarm" per -360(3)(a). If it is unclear why the equipment is in alarm, a service provider must be called immediately to troubleshoot the tank monitor. If it is not a false alarm, appropriate actions must be taken and the suspected release must be reported within 24 hours. Appropriate tightness testing and/or investigation must be done within seven days to ensure public safety and prevent contamination of the environment. **If a leak is observed or suspected (and not investigated), a Notice of Delivery Prohibition may be issued.** WAC 173-360-335(1)(b)
15. **IS THE ATG, PRINTER, AND/OR MODEL OPERATIONAL AND WORKING PER MFR. SPECS?:** For equipment with a printer, ensure it is operating properly (e.g. have owner print inventory report). All power and warning lights should be operational (e.g. have owner press test button to verify lights are working). WAC 173-360-335(1)(b)
16. **IF USING OVERFILL ALARM, ALARM IS SET AT 90% FOR ALL TANKS AND AUDIBLE TO DELIVERY DRIVER:** The overfill alarm must be activated when tanks are at 90% capacity to alarm delivery drivers that the tank is nearly full. The alarm must be easily heard by the driver while dropping fuel. WAC 173-360-305(3)(a)(ii)(B)
17. **IM METHOD/SENSORS TESTED AND OPERATING PER MFR. INSTR.:** You should see proof during the inspection that the interstitial monitoring system and/or sensors were tested and found to be operating properly and per manufacturer's specifications. Testing may be required by some manufacturers. The alarm history on a tank monitor can be reviewed to verify the date the sensors were tested. WAC 173-360-335(1)(b)
18. **SIR VENDOR:** Verify the SIR vendor is using a 3<sup>rd</sup>-party certified method. The SIR vendor must report pass/fail results to the owner/operator within 15 days of receiving the daily inventory records. WAC 173-360-345(6)(i)
19. **INV. CONTROL USES:** Tanks installed prior to October 1, 2012, may be allowed to use an inventory control method as described below. See Daily, Weekly, or Monthly inventory control sections below to determine tank tightness test frequency. Tanks ≤ 1000 gallons are not required to conduct a tightness test if they are using weekly or monthly monitoring. WAC 173-360-345(6)(a), (b), (c)
- a. **Daily inventory control** must show: 1) end of month calculation (1% flow-thru +130 gallons), 2) daily sticking and meter readings, 3) stick readings measured to 1/8", 4) correct tank conversion chart (inches to gallons), 5) drop tube within one foot (or less) of tank bottom, 6) meter has been calibrated (Department of Agriculture sticker or equivalent), and 7) tanks are checked for water monthly. WAC 173-360-345(6)(a)
- All tank sizes require a tank tightness test every five years.
  - Ten years after the tanks meet corrosion protection requirements, tanks must switch to a "monthly monitoring" release detection method. WAC 173-360-345(2)

- b. **Weekly tank gauging** can be used for tanks 2000 gal or less and must show: 1) weekly stick readings with begin and end readings at proper hourly interval (no product added or removed), 2) average of two consecutive stick readings for begin and end readings, 3) stick readings measured to 1/8", and 4) weekly and monthly standards are met for tank size. Waste oil tanks commonly use this method. WAC 173-360-345(6)(b)
  - ≤ 1000 gal. – no tank tightness test required and no "monthly monitoring" release detection method required. WAC 173-360-345(6)(b)
  - 1001 gal. to 2000 gal. – tank tightness test required every 5 years. Ten years after the tanks meet corrosion protection requirements, tanks must switch to a "monthly monitoring" release detection method. WAC 173-360-345(6)(b)
  - >2000 (only emergency power generators) – tank tightness test required every 5 years. Ten years after the tanks meet corrosion protection requirements, tanks must switch to a "monthly monitoring" release detection method. WAC 173-360-345(5)(c)
- c. **Monthly tank gauging** can only be used by emergency power generator tanks 2000 gal. or less and must show: 1) inputs and withdrawals recorded, 2) monthly stick readings with begin and end readings at least 21 days apart, 3) average of two consecutive stick readings for begin and end readings, 4) stick readings to 1/8", 5) tank is checked for water monthly, and 6) monthly standards are met for tank size. WAC 173-360-345(6)(c)
  - 1000 gal. or less – no tank tightness test required and no "monthly monitoring" release detection method required. WAC 173-360-345(5)(a)
  - 1001 gal. to 2000 gal. – tank tightness test required annually and no "monthly monitoring" release detection method required. WAC 173-360-345(5)(b)

20. **DW AND IM, IF INSTALLED AFTER 10/1/12:** New tanks installed after October 1, 2012 must be double-walled and interstitially monitored. WAC 173-360-800 to -820

#### **E. Line Release Detection Records**

21. **PIPING PUMPING METHOD:** Indicates whether the product in the piping is pressurized or suction is being used to pull the product to the dispenser. Depending on which method is used, additional requirements may apply.
22. **IF PRESSURIZED, ALLD TEST COMPLIANT:** ALLDs are required to be tested annually to verify they are operational. Record the last two testing dates and number of line leak detectors tested. WAC 173-360-350(3)(a)
23. **IF PRESSURIZED, SECONDARY RD METHOD USED:** In addition to an ALLD, pressurized piping systems must be monitored annually (line tightness test) or conduct monthly line monitoring using CITLDS, interstitial monitoring, SIR, or 0.2 gph electronic ALLD. The last two line tightness tests or previous 12 months' of line monitoring records should be reviewed. WAC 173-360-350(2)(a)(ii)

**For EPA Compliance Tracking, mark "yes" on the last section if they conducted the last two annual tests OR have 8 of the last 12 months' (including the last two consecutive months) monthly monitoring test results available for review with compliant results.**

24. **IF NON-SAFE SUCTION, LINE RD METHOD USED:** Piping in non-safe suction systems must be tested for tightness every three years or be monitored monthly for releases. WAC 173-360-350(3)(c) and (2)(b)



25. **IM METHOD TESTED AND OPERATING PER MFR. INSTR.:** You should see proof during the inspection that the interstitial monitoring system and/or sensors were tested and operating properly and per manufacturer's specifications. Testing may be required by some manufacturers. The alarm history on a tank monitor may be reviewed to verify the date the sensors were tested. WAC 173-360-335(1)(b)
26. **DW AND IM, IF INSTALLED AFTER 10/1/12:** After October 1, 2012, when new piping is installed or more than 50% of a piping run is replaced, the entire piping run must be double-walled and interstitially monitored. WAC 173-360-800 to -820

## II. UST Equipment Observations

The UST equipment to be inspected includes each tank turbine area, if applicable, under each dispenser (including satellites), each spill bucket and each overfill device. Equipment may be opened by a service provider or tank owner/operator.

### F. Manhole Above Tank

27. **TAG VISIBLE TO DISTRIBUTOR OR AT ESO:** The facility compliance tag (tag) must be visible to the distributor or located at the emergency shutoff (ESO) device. One tag is issued by Ecology to each UST site or system but some facilities have more than one tag if there is more than one tank "nest/location" within a site. The tag indicates the UST system has met the 1998 upgrade or new tank requirements and is legally allowed to store regulated product and receive deliveries (except when Red Tags are placed on all active tanks at a site). The tag number at the site must match the most recent tag number issued by Ecology. If all tanks at the site are temporarily closed, the tag should have been returned to Ecology within 30 days. **If a tank has never been issued a compliance tag, a Notice of Delivery Prohibition may be issued.** RCW 90.73.020(5)(a) and WAC 173-360-130(4)
28. **TANK CAPACITY:** Known volume of tank or tank compartment.
29. **PRODUCT STORED:** Product currently being stored in tank or tank compartment.
30. **MANIFOLDED (MAIN/AUX) OR COMPARTMENTALIZED:** If a tank is manifolded to another, document it as "main" (with turbine) and "auxiliary" (siphon). Do not confuse this with manifolded lines. Tanks may also contain more than one compartment. The inspector may use this area to document observations as they see fit. A sketch of the tank system may also be added at the end of page 4.
31. **TANK MATERIAL BASED ON RECORDS:** If tank material and construction is based on records or database only, this line may be used to circle the applicable information or write it in each box.
32. **TANK MATERIAL OBSERVED:** If the tanks are visible from the manhole and the tank material can be identified by the inspector, circle applicable tank material on the checklist. If the tank material is not visible (NV), you may write NV in this space. This information can be used to determine if the tanks are compatible with the product stored or if CP is required.
33. **PIPE MATERIAL BASED ON RECORDS:** If the piping material and construction is based on records or database only, this line may be used to circle the applicable information or write it in each box.
34. **PIPE MATERIAL OBSERVED:** If the piping is visible in the manhole, document the type of piping used for each tank. If the piping material is not visible (NV), you may write NV in this space. This information can be used to determine if the correct method of release detection is being applied or if CP is required.

35. **TURBINE ALLDS INSTALLED:** Note if the ALLD is present for each line and verify if it is compliant with throughput and fuel. If there are not enough ALLDs based on manifold of lines and type of ALLD (mech. or elec.), mark “no”. Document whether mechanical or electronic ALLDs are installed. WAC 173-360-350(2)(a)(i)
36. **IF IM, DW PIPE OPEN; SENSOR, PIPING SLOPE AND SUMP PENETRATIONS APPEAR CORRECT:** Interstitial line sump sensors may be used as a form of IM and are typically located in the turbine sump. The sensors must be placed so they can detect a leak from the inner, primary piping wall. They are usually installed vertically and placed within an inch of the sump’s lowest spot. If using another form of IM, be sure manufacturer’s instructions are followed.  
  
Secondary containment piping must be UL listed when interstitial monitoring is used (see regulatory interpretation for more information).  
  
If IM is used, the sensor must be located in the sump that is most down-gradient. This will allow product in piping to drain back to the sump with the sensor. WAC 173-360-335(1), -345(6)(h), 820(3)(a)(ii)
37. **TURBINE SUMPS ARE FREE OF LIQUID:** Each sump lid should be opened to determine if water or fuel is in the sump. If petroleum is discovered in the sump, the leak source should be investigated. All weeps and drips must be repaired. WAC 173-360-335(1)(b)
38. **IF DIRECT BURY OR FUEL IN SUMP, CHARGED TURBINE HAS NO OBVIOUS LEAKS:** If either of these is observed, the turbine can be charged to see if the equipment is leaking. If leaks are discovered and no containment is present, turbines must be shut down until they are repaired. A Site Check must be conducted if product has entered the environment and it is suspected to be contaminated. WAC 173-360-370(1)(c)
39. **SFC/PIPING AT TANK IS PROTECTED FROM CORROSION:** If the turbine and/or SFCs are directly buried, all steel components must be protected from corrosion by a rubber boot or cathodic protection system (unless a corrosion expert approves of another method). If a CP system is used, be sure the CP test on page 1 includes testing of these piping components. WAC 173-360-305(2)(d)
40. **UST SYSTEM COMPATIBLE WITH PRODUCT STORED:** If an UST system stores gasoline with more than 10% ethanol (>E10) or diesel with more than 20% biodiesel (>B20), the third-party certifications for the tank, piping, tank monitor and other UST equipment must be checked to determine if they are compatible with these products. Failure to confirm compatibility may result in degradation of equipment and a release to the environment. Compatibility verified as a result of an inspection is based on information obtained visually, from owner records and/or 3<sup>rd</sup>-party certifications. Compatibility records may be provided after the inspection. WAC 173-360-323

## **G. Spill/Overfill Equipment**

41. **SPILL BUCKET PROPERLY INSTALLED AND NO OBVIOUS CRACKS:** Inspect each spill bucket to be sure one is present, clean and has no holes or cracks that would allow product to enter the environment. Defective spill buckets require immediate repair or replacement. **If no spill prevention equipment is installed, a Notice of Delivery Prohibition must be issued.** WAC 173-360-305(3)(a)(i)
42. **OVERFILL AUTO SHUT-OFF DEVICE IS NOT TAMPERED WITH:** Check that the device is visible in each drop-tube and has not been tampered with (i.e. a stick in the tank preventing the device from operating). These devices should only be used with gravity deliveries. **If no overfill prevention device is installed, a Notice of Delivery Prohibition must be issued.** WAC 173-360-305(3)(a)(ii)(A)

The scenario on the following page is warned against in PEI’s RP100 as preventing proper overfill prevention and increasing health/environmental hazards. Since this scenario prevents proper overfill prevention, a violation should be documented.

Scenario	Does it comply with overfill prevention requirements?	Does it increase the health or environmental hazard?
Installed on tank w/ remote fill and gauge opening directly above the auto shut-off device but no “trap door” installed	No	Yes

43. **OVERFILL ALARM COMPLIANT:** The overfill limit must be set at 90% and the alarm must be audible to the delivery driver. On some models, the alarm can be tested at the tank monitor by checking the output relay (not the exterior test button) to be sure it is set up properly. WAC 173-360-305(3)(a)(ii)(B)

44. **OVERFILL BALL-FLOAT DEVICE PRESENT:** Ball floats may be set at 90% tank capacity or use 30-minute valve set at 300 gallons below the tank top. The top fitting on the ball floats should be observed during the inspection. If it is not opened during the inspection, it may be verified by service provider records to ensure the cage has not rusted out. WAC 173-360-305(3)(a)(ii)(C)

The following scenarios are warned against in PEI’s RP100 as either preventing proper overfill prevention and/or increase health/environmental hazards. If the scenario does not comply with the overfill prevention requirements, a violation should be documented. However, if the scenario provides proper overfill prevention, but an increased health or environmental hazard exists, the inspector should recommend making improvements to reduce this risk.

Scenario	Does it comply with overfill prevention requirements?	Does it increase the health or environmental hazard?
Installed on tanks with pumped or pressurized deliveries	No	Yes
Installed on tank with suction pump and air eliminator	No	Yes
Installed on tank with co-axial Stage 1 vapor recovery	No	Yes
Installed on tank w/ remote fill and gauge opening	No	Yes
Installed with auto shut-off devices (i.e. flapper valves)	Yes	Yes

## H. Dispenser/Aboveground Equipment

45. **PIPE MATERIAL OBSERVED:** If the piping is visible under the dispenser, document the piping material. This information can be used to determine if CP is required.

46. **DISP. SUMPS ARE FREE OF LIQUID:** If petroleum is discovered in a dispenser sump, the leak source should be investigated. All weeps and drips must be repaired. WAC 173-360-335(1)(b)

47. **SFC/PIPING AT DISP. IS PROTECTED FROM CORROSION:** If the piping under the dispenser is directly buried, any steel components of the product piping, and SFCs must be protected by a rubber boot, have a spike anode or use an impressed current cathodic protection system (or another method approved by a corrosion expert). Be sure the CP test on page 1 includes readings for these components, if applicable. WAC 173-360-305(2)(d)
48. **SAFE SUCTION VERIFIED AND MEETS CRITERIA:** Suction systems with only one check valve located as close to the suction pump as practical and piping that slopes back to the tank are considered safe suction; these systems do not require release detection. If the check valve is located at the tank, there is more than one check valve, or the piping slopes away from the tank, a tightness test is required every three years or the piping must be monitored monthly for releases. WAC 173-360-350(2)(b)
49. **EMERGENCY SIGN(S) VISIBLE FROM DISPENSERS AND TANKS:** Signs providing information about the facility and 24-hour contacts for the facility must be installed so that anyone delivering product or pumping fuel can easily locate them. More than one sign may be required at some facilities. WAC 173-360-750

The information above is collected in targeted areas to determine compliance with state and federal regulations and observations made on the day of inspection. The EPA Compliance Tracking (SOC) results may differ from Washington's compliance measure and should not be confused.

### **EPA Compliance Tracking (check "yes" if...)**

**OVERSPILL/OVERFILL/CP**: State requirements have been met.

**RELEASE DETECTION**: State requirements have been met (i.e. 12 of the last 12 months), but EPA only requires 8 of the last 12 months' (including the last two consecutive months) test results with passing results available for review. Note: A site may be in compliance with EPA requirements but in violation of state requirements.

**CLASS A/B/C CERTIFIED**: Operators were trained and certified prior to the day of inspection. If operators were trained, but there is another, state-specific, violation (such as a documentation violation), mark EPA Compliance Tracking for operator training "yes" and answer question 4 on the inspection checklist "no".

## **Inspection Checklist Acronym/Abbreviation List**

ALLD – Automatic Line Leak Detector  
ATG – Automatic Tank Gauge  
BL – Business License  
CITLDS – Continuous Inventory Tank Leak Detection System  
CP – Cathodic Protection  
DEF - Deferred  
DW – Double-walled  
ESO - Emergency Shut-Off Device  
FR – Financial Responsibility  
FRP – Fiberglass Reinforced Plastic  
IM – Interstitial Monitoring  
Imp. – Impressed  
Int. - Interior  
Inv. – Inventory  
LTT – Line Tightness Test  
NDP – Notice of Delivery Prohibition  
PLIA – Pollution Liability Insurance Agency  
RD – Release Detection  
SFC – Steel Flex Connector  
TA – Technical Assistance  
TTT – Tank Tightness Test